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COURT OF CRIMINAL APPEALS  
2/14/2019  
DEANA WILLIAMSON, CLERK

February 14, 2019

Deana Williamson – Clerk of the Court  
Texas Court of Criminal Appeals  
201 West 14th Street, Room 106  
Austin, Texas 78701

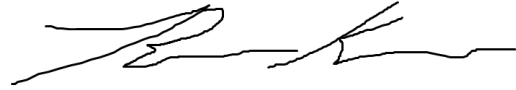
RE: Supplemental List of Authorities  
*Watkins v. State*, PD-1015-18, Set for Oral Arguments February 20, 2019

Dear Ms. Williamson:

Please advise the Court that the State has provided this supplemental list of authorities in compliance with the Court's standing Oral Argument Instructions. In addition to the cases cited in the State's brief, the State also intends to introduce the following authorities in oral arguments:

*Brown v. State*, 196 S.W.2d 819 (Tex. Crim. App. 1946) (on mot. for reh'g) (stating that the Court would not be justified in overruling a prior definition if the legislature has reenacted the defined statute)  
*Collier v. Poe*, 732 S.W.2d 332 (Tex. Crim. App. 1987) (reaffirming the position taken in *Brown v. State*)  
*Marin v. State*, 891 S.W.2d 267 (Tex. Crim. App. 1994) (discussed the legislative silence doctrine which is the subject of the distinction in *Medrano*)  
*Moosani v. State*, 914 S.W.2d 569 (Tex. Crim. App. 1995) (reaffirming legislative silence doctrine from *Marin*)  
*Smith v. State*, 5 SW3d 673 (Tex. Crim. App. 1999) (similar to the case at bar)  
*State v. Medrano*, 67 S.W.3d 892 (Tex. Crim. App. 2002) (noting a distinction between reenactment of a statute after judicial definition and mere legislative silence)  
*State v. Colyandro*, 233 S.W.3d 870 (Tex. Crim. App. 2007) (reaffirming and providing further analysis of distinction from *Medrano*)

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Koehl', with a long horizontal line extending to the right.

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cc: State Prosecuting Attorney (by e-service)  
Jason Niehaus (by e-service)